IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DLEAWARE

PRAGMATUS AV, LLC)	
Plaintiff,)	
v.)	C.A. No. 11-1082-LPS-CJB
AASTRA TECHNOLOGIES LTD. and AASTRA USA, INC.,)	
Defendants.))	

JOINT MOTION AND PROPOSED ORDER FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiff Pragmatus AV, LLC ("Pragmatus") and defendant Aastra USA, Inc. ("Aastra") respectfully move this Court to schedule a teleconference to address an outstanding dispute regarding the drafting of a protective order.

As a result of a previous teleconference with Chambers, the parties will provide submissions and present their respective positions consistent with the Court's prior order regarding discovery matters during a teleconference on March 20, 2013 at 4:00 p.m. with counsel for Pragmatus to initiate the call.

/s/ Brian E. Farnan	/s/ Andrew E. Russell
Brian E. Farnan (No. 4089)	John W. Shaw (No. 3362)
FARNAN LLP	Jeffrey T. Castellano (No. 4837)
919 North Market Street	Andrew E. Russell (No. 5382)
Wilmington, DE 19801	SHAW KELLER LLP
(302) 777-0300	300 Delaware Avenue, Suite 1120
bfarnan@farnanlaw.com	Wilmington, DE 19801
Attorney for Plaintiff	(302) 298-0700
	jshaw@shawkeller.com
	jcastellano@shawkeller.com
	arussell@shawkeller.com
Dated: March 11, 2013	Attorneys for Defendants

SO ORDERED this day of	March, 2013.
	United States District Judge